

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
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This document relates to:

Federal Insurance Co. v. al Qaida, 03 CV 06978 (RCC)
Burnett v. al Baraka Investment & Development Corp., No. 03 CV 5738 (RCC)
Burnett v. al Baraka Investment & Development Corp., No. 03 CV 9849 (RCC)
Ashton v. al Qaida Islamic Army, No. 02 CV 6977 (RCC)
Barrera v. al Qaeda Islamic Army, No. 03 CV 7036 (RCC)
Salvo v. al Qaeda Islamic Army, No. 03 CV 5071 (RCC)

**AFFIRMATION OF SEAN P. CARTER IN OPPOSITION TO
THE SAUDI HIGH COMMISSION FOR RELIEF
TO BOSNIA AND HERZEGOVINA'S MOTION TO DISMISS
CERTAIN CONSOLIDATED COMPLAINTS**

Sean P. Carter, Esq., affirms as follows:

1. I am an attorney admitted to practice *pro hoc vice* in the above-captioned proceedings, and a member of the law firm Cozen O'Connor. I submit this Affirmation to transmit to the Court the following documents submitted in opposition to the Motion to Dismiss filed by Defendant, the Saudi High Commission for Relief to Bosnia and Herzegovina.

2. Exhibit 1 to this Affirmation is a true and accurate copy of an article entitled "*Tackling the Financing of Terrorism in Saudi Arabia*," published by *Policywatch* on March 11, 2002.

3. Exhibit 2 to this Affirmation is a true and accurate copy of the *Second Report of the Monitoring Group Established Pursuant to Resolution 1363 (2001), on Sanctions on Al*

Qaida, the Taliban and Individuals and Entities Associated With Them, published by the *United Nations Security Counsel* on December 2, 2003.

4. Exhibit 3 to this Affirmation is a true and accurate copy of a report entitled “*Terrorists Financing, Report of an Independent Task Force Sponsored by the Council on Foreign Relations*” published by the *Council on Foreign Relations* in 2002.

5. Exhibit 4 to this Affirmation is a true and accurate copy of an article entitled “*Saudis Reform Charities as Antiterror Measure*,” which appeared on CNN.com on June 2, 2004.

6. Exhibit 5 to this Affirmation is a true and accurate copy of the “*Law on Humanitarian Activities and Humanitarian Organizations of the Federation of Bosnia and Herzegovina*,” which appeared in the *Official Gazette*, No. 35, in September 1998.

7. Exhibit 6 to this Affirmation is a true and accurate copy of the Bosnian Ministry of Finance’s 2002 Audit of the Saudi High Commission, which was submitted as an exhibit to the Motion to Dismiss of Prince Salman Bin Abdulaziz Al Saud.

8. Exhibit 7 to this Affirmation is a true and accurate copy of the List of Saudi Organizations from www.saudinic.net.sa/cat/org.sa.html.

Affirmed in Philadelphia, Pennsylvania on August 24, 2004.

/s/
Sean P. Carter